

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

FOUR TIMES SQUARE  
NEW YORK 10036-6522

TEL: (212) 735-3000

FAX: (212) 735-2000

www.skadden.com

DIRECT DIAL  
212-735-3076  
DIRECT FAX  
917-777-3076  
EMAIL ADDRESS  
DOUGLAS.FLEMING@SKADDEN.COM

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December 6, 2012

**VIA ECF**

Judge William F. Kuntz, II  
United States District Court for the  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: ***Abraham, et al. v. American Home Mortgage Servicing, et al.,  
Case No. 1:12-cv-4686 - WFK-JMA (E.D.N.Y.)***

Dear Judge Kuntz:

We represent Defendant State Farm Realty Mortgage, LLC, incorrectly listed as a/k/a, State Farm Bank, FSB ("State Farm"), in the above-referenced action. We submit this letter to request an extension of time to answer, move, or otherwise respond to the Second Amended Complaint.

State Farm was purportedly served through the Secretary of State on November 16, 2012, and therefore State Farm's deadline for answering, moving, or otherwise responding to the Second Amended Complaint would be tomorrow, December 7.

We were retained only this week to represent State Farm, which was named as a Defendant for the first time in the Second Amended Complaint. The Second Amended Complaint contains over 550 numbered paragraphs, spanning over 150 pages and listing approximately 40 defendants. Given the nature of this action and our client's only recent inclusion as a defendant, counsel seeks additional time to review and research the allegations and consult with our client.

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Accordingly, in light of the foregoing and the timing of the upcoming holidays, State Farm respectfully requests an extension of time up to and including January 21, 2013, to answer, move or otherwise respond to the Second Amended Complaint.

We attempted to contact Plaintiffs' counsel by telephone and email this morning to obtain their consent to this request, but have not been able to reach them. Given the impending deadline of tomorrow and our only recent retention, we are filing this letter now without having been able to obtain Plaintiffs' position. State Farm has not previously requested any extension of time.

We thank the Court for its time and consideration.

Respectfully submitted,

/s/ Douglas E. Fleming III  
Douglas E. Fleming III

cc: All Counsel of Record (via ECF)